REMARKS

Claims 1-21 are pending. The Office Action, dated April 20, 2007, in this Application has been carefully considered. The above amendments and the following remarks are presented in a sincere attempt to place this Application in condition for allowance. Claims 1, 3 and 19-21 have been amended in this Response. Claim 2 has been canceled without prejudice. As a result, Claims 1 and 3-21 remain pending. Reconsideration and allowance are respectfully requested in light of the above amendments and following remarks.

Applicants wish to thank the Examiner for the courtesy of the interview conducted on July 19, 2007. During the interview, the above-referenced amendments were discussed. Tentative agreement was not reached that such amendments patentably distinguish from the art currently of record.

Claim 2 is objected to. The Examiner alleges that "the code segments" lacks proper antecedent basis. Claim 2 has been canceled without prejudice, thus rendering the objection to Claim 2 moot.

Claim 3 stands rejected under 35 U.S.C. § 112, second paragraph, as being indefinite for failing to particularly point out and distinctly claim the subject matter which Applicants regard as the invention. Specifically, the Examiner alleges that "the client" lacks proper antecedent basis. Claim 3 has been amended to correct typographical errors, which also corrects the antecedent basis of "client." Accordingly, Applicants respectfully request that the 35 U.S.C. § 112, second paragraph, rejection be withdrawn. Claim 3 has also been amended to reflect dependence from Claim 1, in light of the cancellation of Claim 2.

Claims 20 and 21 stand rejected under 35 U.S.C. § 101 as reciting non-statutory subject matter. Specifically, the Examiner alleges that "[a] computer program product" and "a computer

program" are directed to software per se because neither recites a computer medium that can be read by a machine. Claim 20 has been amended to recite "[a] computer program product, embodied on a computer readable medium …" and Claim 21 has been amended to recite "a computer program, embodied on a computer readable medium …." Therefore, Applicants respectfully request that the 35 U.S.C. § 101 rejections be withdrawn.

Claims 1, 6-8, 10, 12, 14, 17, 18, 20 and 21 stand rejected under 35 U.S.C. § 102(b) by U.S. Patent No. 5,784,035 to Hagiwara et al. ("Hagiwara"). Claim 19 stands rejected under 35 U.S.C. § 102(e) by U.S. Patent No. 7,082,398 to Apple et al. ("Apple"). Claims 2-5, 11, 13, 15 and 16 stand rejected under Hagiwara in view of Apple. Claim 9 stands rejected under Hagiwara in view of U.S. Patent Application No. 2005/0093894 by Tretter et al. ("Tretter"). In light of the amendments submitted herewith, Applicants respectfully submit that the rejection of Claim 2 is moot and the rejections of the remaining Claims have been overcome. Accordingly, Applicants respectfully request that the rejections of Claims 1 and 3-21 be withdrawn.

Rejected independent Claim 1, as now amended, more particularly recites one of the distinguishing characteristics of the present invention, namely "dynamically defining a plurality of image segments …." Support for this amendment can be found, among other places, in original Claim 2 and paragraph [0031] of the original Application, as referenced in the published Application.

Hagiwara was cited as allegedly fully disclosing the limitations of original Claim 1; however, the Examiner admitted that Hagiwara did not teach dynamically defining segments. Office Action, page 9. Apple was cited against Claim 2, allegedly as meeting this limitation, specifically Figure 1 and column 4, lines 1-5 of Apple.

However, Apple does not disclose dynamically defining a plurality of image segments. Instead, Apple discloses that a ticker-display scrolls across a pre-defined and statically-located message area 120. See Figures 1 and 1A in light of column 4, lines 1-4 of Apple, showing message area 120 fixed at the top of the video wall 100. Apple merely teaches that the content of the message area 120 is dynamic, whereas the image segments themselves are fixed and are not dynamic. See in general, the descriptions of Figures 1-2 of Apple, indicating a fixed, predefined scheme for message and display areas 120-170. Therefore, neither Hagiwara nor Apple, either alone or in combination, teaches, suggests or discloses dynamically defining a plurality of image segments.

In view of the foregoing, it is apparent that the cited references do not teach, suggest or disclose the unique combination now recited in amended Claim 1. Applicants therefore submit that amended Claim 1 is clearly and precisely distinguishable over the cited references in a patentable sense, and is therefore allowable over these references and the remaining references of record. Accordingly, Applicants respectfully request that the rejection of amended Claim 1 under 35 U.S.C. § 102(e) be withdrawn and that Claim 1 be allowed.

Claims 3-18 depend from and further limit Claim 1. As shown above neither Hagiwara nor Apple, either alone or in combination, teaches, suggests or discloses all the limitations of Claim 1. Tretter is not relied upon to supply the missing limitations. Hence, for at least the aforementioned reasons, dependent Claims 3-18 should be deemed to be in condition for allowance. Applicant respectfully requests that the rejections of dependent Claims 3-18 also be withdrawn.

Rejected independent Claim 19 now recites "the client is configured to dynamically segment a video image for substantially concurrent rendering by the plurality of server computers." Similarly, rejected independent Claims 20 and 21 now each recite "computer code for dynamically

defining a plurality of image segments ...." Support for these amendments can be found, among other places, in original Claim 2 and paragraph [0031] of the original Application, as referenced in the published Application.

Applicants contend that the rejections of amended Claims 19-21 are overcome/traversed for at least some of the reasons that the rejection of Claim 1, as amended, is overcome/traversed. These reasons include the cited references not teaching, suggesting or disclosing dynamically segmenting or dynamically defining a plurality of image segments. Applicants therefore respectfully submit that amended Claims 19-21 are clearly and precisely distinguishable over the cited references in any combination. Accordingly, Applicants respectfully requests that the rejections of amended Claims 19-21 under 35 U.S.C. § 102(e) be withdrawn and that Claims 19-21 be allowed.

Applicants have now made an earnest attempt to place this Application in condition for allowance. For the foregoing reasons and for other reasons clearly apparent, Applicants respectfully request full allowance of Claims 1 and 3-21.

Applicants do not believe that any fees are due; however, in the event that any fees are due, the Commissioner is hereby authorized to charge any required fees due (other than issue fees), and to credit any overpayment made, in connection with the filing of this paper to Deposit Account No. 09-0447 of IBM Corporation.

Should the Examiner deem that any further amendment is desirable to place this Application in condition for allowance, the Examiner is invited to telephone the undersigned at the number listed below.

Respectfully submitted,

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